

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Walter D. Nealy, Esq.  
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Telephone: (201) 227-0063  
Attorney for Debtor

In Re:  
Gordon A. Washington

Case No.: 14-01319

Judge: Donald Steckroth(TBA)

Chapter: 13

Recommended Local Form:  Followed  Modified

**APPLICATION FOR RETENTION OF PROFESSIONAL**

1. The applicant, Gordon A. Washington, is the (check all that apply):

Trustee:  Chap. 7  Chap. 11  Chap. 13.

Debtor:  Chap. 11  Chap. 13

Official Committee of \_\_\_\_\_

2. The applicant seeks to retain the following professional Charles A. Gruen, Esq. to serve as (check all that apply):

Attorney for:  Trustee  Debtor-in-Possession

Official Committee of \_\_\_\_\_

Accountant for:  Trustee  Debtor-in-possession  
 Official Committee of \_\_\_\_\_

Other Professional:  
 Realtor  Appraiser  Special Counsel  
 Auctioneer  Other (specify): \_\_\_\_\_

3. The employment of the professional is necessary because:

The debtor filed an adversary proceeding disputing a putative claim by alleged secured creditors. Resolution of this claim is critical to the debtor's Chapter 13 plan.

4. The professional has been selected because:

This attorney has over 30 years experience in complex commercial litigation.  
His firm has the staff and resources to successfully try the adversary complaint.

5. The professional services to be rendered are as follows:

Attorney services in the adversary complaint entitled Gordon A. Washington v. Specialized Loan Services, LLC and the Bank of New York Mellon, as Trustee for the Certificate-Holders of the CWABS, Inc. Asset-Backed Certificates 2007-5

6. The proposed arrangement for compensation is as follows:

Charles A. Gruen, Esq. - \$350.00 per hour  
Associates attorneys - \$250.00 - \$275.00 per hour  
Paralegal Assistants - \$85.00 - \$125.00 per hour

7. To the best of the applicant's knowledge, the professional's connection with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

None

Describe connection: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

8. To the best of the applicant's knowledge, the professional (check all that apply):

does not hold an adverse interest to the estate.  
 does not represent an adverse interest to the estate.  
 is a disinterested person under 11 U.S.C. § 101(14).  
 does not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which he/she will be retained under 11 U.S.C. § 327(e).

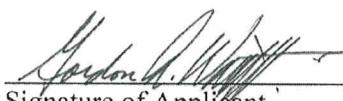
Other; explain:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Wherefore, the applicant respectfully requests authorization to employ the professional to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may hereafter determine and allow.

Date: July 8, 2014

  
\_\_\_\_\_  
Signature of Applicant

Gordon A. Washington  
Name of Applicant